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**THE DAVID EPSTEIN LAW FIRM**

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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

JOHN D. THOMAS,

Plaintiff,

vs.

LEAGLE, INC., a former Arkansas  
corporation; and DOES 1-25,

Defendants.

) Case No. 8:23-cv-00236-DOC-JDE

) Assigned for all purposes to:

)

) **NOTICE OF DEFAULT AND**

) **REQUEST FOR ENTRY OF DEFAULT**

) **JUDGMENT**

)

) Date: August 27, 2023

) Time: 8:30am

) Courtroom 10 A

)

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To the court and defendant:

Please take notice that on August 27, 2023, or as soon thereafter as counsel may be heard by the above-entitled court, located at 411 West Fourth St., Santa Ana, CA 92701, plaintiff will present its application for a default judgment against defendant.

At the time and place of the hearing plaintiff will present proof of the following matters:



**Declaration of David G. Epstein**

I, David G. Epstein, say:

1. I am licensed California attorney admitted to their of this court. I make this declaration of my own personal knowledge and could and would so testify if called.

2. This action was filed on February 7, 2023. Summons was issued on February 9, 2023.

3. On April 14, 2023, the court authorized service of process on this defendant by electronic means (Docket 17)

4. On June 13, 2023, plaintiff filed a proof of service by said means (Docket 18).

5. Defendant has not responded in any manner to the summons and complaint and has not communicated with the undersigned. The time for a response to the complaint has passed.

6. Defendant is not a minor or an incompetent person, and is not in the military service and accordingly the Servicemembers Civil Relief Act does not apply.

7. I served a copy of this application on July 30, 2023 in the same manner authorized by the court for service of the summons and complaint.

If called as a witness, I could and would testify to the matters contained herein, which I know of my own personal knowledge, except for those matters stated upon information and belief, and as to them, I believe them to be true.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed at Laguna Beach, California, on July 30, 2023.

*/s/ David G. Epstein*

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David G. Epstein